

**IN THE UNITED STATES DISTRICT COURT RECEIVED  
FOR THE MIDDLE DISTRICT OF ALABAMA**

**DIVISION** 2005 JUL 14 P 2:41

<u>Calvin Scott, Sr.</u> )	)	DEBRA P. HACKETT, CLK U.S. DISTRICT COURT MIDDLE DISTRICT ALA.
<u>(Blind Vendor)</u> )		
<u>Plaintiff(s),</u> )	)	CIVIL ACTION NO.
v.)		
<u>James (Buddy) Swearengin, Jr.</u> )	)	2:05cv651 - 7
<u>State of Alabama Dept. of Finance</u> )		
<u>Defendant(s)</u> )		<b>DEMAND FOR JURY TRIAL</b>

**COMPLAINT**

1. Plaintiff(s) address and telephone number: 1416 Marler Rd  
Pike Road, Alabama 36064  
(334) 272-2657
2. Name and address of defendant(s): James (Buddy) Swearengin, Jr.  
C/O Mr. Searcy Rushing  
State of Alabama (Dept. of Finance)  
425 South Union St.  
Montgomery, Alabama 36130
3. Place of alleged violation of civil rights: 50 Monroe St  
Gordon Person's Office Building  
Montgomery, Alabama 36104
4. Date of alleged violation of civil rights: Jan. 31, 2005; Feb. 9<sup>th</sup>, 14<sup>th</sup>, 22<sup>nd</sup> 2005
5. State the facts on which you base your allegation that your constitutional rights have been violated: On the dates listed, the above defendant(s) violated my constitutional rights for equal employment access when he denied me the same access as all other non-handicapped workers to my assigned work area(s), denied me reasonable accommodations as I requested per both state and federal ADA Title I, II, and 504 laws. Then the defendant(s) conspired/corroborated with others defame my character, ruin my good reputation, and take away my right for equal employment and my ability to be self sufficient to provide for myself and my family. His actions of defamation of character, slander, libel, intimidation, threats to my livelihood, and harrassment immediately cost me my job. With me being elderly and totally blind Mr. Swearengin's actions caused me to be emotionally damaged and distressed to say the least.

6. **Relief requested:** I am asking the court to award me a total monetary judgement of \$1,000,000.00 (one million dollars) in punitive damages, imprisonment for the defendant(s) in the county jail, or sentenced to hard labor for the county, not exceeding six months, one or both, at the discretion of the jury per Alabama State Code §13-6-203, and that the defendants pay all court costs associated with this suit.

July 14, 2005  
Date

Calvin Scott Sr.  
Plaintiff(s) Signature

1416 Marler Rd  
Pike Road, Alabama 36064  
Address, City, State Zip Code

(334) 272-2657  
Telephone Number